

BRACEWELL

April 26, 2019

VIA ECF

Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Abdel-Wadood, 19 Cr. 233

Dear Judge Kaplan:

We write to propose a bail package to secure Mustafa Abdel-Wadood's release from the MCC. The government has consented to these conditions.

1. Mr. Abdel-Wadood would reside at a studio apartment in Manhattan; we have provided the address to the government and Pretrial Services. The plan is for his wife and children, ages 14 and 17, to join him here for the summer, at which point we would seek a larger apartment and ask the Court to modify this condition accordingly. Mr. Abdel-Wadood would be subject to home incarceration. More specifically, he would be allowed to have access to the facilities of the building in which the apartment is located -- the business center, gym, etc. -- but would not leave the building, except for court appearances. Any other travel outside the building would need to be approved by the Court.

2. Mr. Abdel-Wadood would wear an electronic monitoring device (GPS) at all times. He would report telephonically to Pretrial Services as directed.

3. Mr. Abdel-Wadood would sign a \$10 million personal recognize bond co-signed by four financially responsible persons. We have provided the names of the four co-signers to the government, and it has accepted them, subject to interview. Three of the four co-signers are U.S. citizens; the fourth is a U.S. resident; and each has property here. Should the Court wish to see the names of the co-signers and information about them, we would gladly provide it.

4. Two of the co-signers would post property (an apartment in New York City and a home on Long Island). Each of the properties is valued at approximately \$5 million, net of

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mortgage. We are prepared to share with the government (and the Court if it wishes) documentation to support these valuations.

5. The defendant would be released on bond only when all of the above conditions are met.

We remain available to meet with the Court on Monday, April 29 at 2:30 p.m. to address any concerns, if necessary.

Respectfully submitted,

/s/ Paul Shechtman

Paul Shechtman
Maggie Lynaugh

PS/ML:wr